

F. Beth Morgan
Morgan & Luttrell, LLP
711 Navarro Street, Suite 210
San Antonio, TX 78205
(210) 224-5399
(210) 224-5091 (fax)
morgan@morgan-luttrell.com

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE	§	CASE NO. 09-36300-sgj
	§	
1300 CAMPBELL, L.P.	§	CHAPTER 11
	§	
DEBTOR.	§	Hearing set - October 12, 2009
	§	at 1:30 p.m.

WITNESS AND EXHIBIT LIST

Comes Now, GE Commercial Finance Business Property Corporation f/k/a General Electric Capital Business Asset Funding Corporation (“GEBP”), and files this its Witness and Exhibit List relating to Debtor’s Motion for Preliminary and Continuing Authority to Use Cash Collateral, (2) Authority to Make Adequate Protection Payments, (3) Suspend Holdover Rent Provisions under Commercial Lease Agreement, and (4) for Related Relief filed by Debtor (the “Motion”). The GEBP hereby identifies the following witnesses who may be called to testify at the hearing:

Witnesses

1. Terrance P. Cosgrove
2. Julius Blatt
3. Sheila Adlof
4. Any witness designated or called by any other party.
5. Any witness deemed necessary or appropriate at the hearing.

GEBP may introduce the following Exhibits:

Exhibits

1. Promissory Note - 5.18.99
2. Commercial Deed of Trust, Security agreement, Assignment of Leases and Rents and Fixture Filing - 5.18.09
3. UCC 1 dated 6.1.09 - Filed under 99-106458
4. UCC Continuation 04-00609019 dated 3.17.04 to UCC 99-106458
5. Promissory Note - 7.21.04
6. Commercial Deed of Trust, Security Agreement, Assignment of Leases and Rents, and Fixture Filing - 7.21.04
7. Assignment of Rents and Leases dated 7.21.04
8. UCC 1 dated 7.27.04 - Filed under 04-0076192544
9. UCC Continuation 09-00063635 dated 3.5.09 to UCC 04-0076192544
10. UCC 1 dated 7.23.04 - Filed under 04-0075972357
11. Commerical Lease Agreement with Advanced Paradigm, Inc.
12. Tenant Estoppel Certificate dated 7.15.04
13. Nondisturbance, Attornment and Subordination Agreement
14. Letter from GE to Patrick Calvano regarding loan maturity date dated 3.17.09
15. Letter from Gatex Properties to GE regarding loan maturity dated 7.6.09
16. Letter from GE to Gatex Properties in response to Gatex' 7.6.09 letter dated 7.23.09
17. Demand letter to Debtor dated 9.1.09, overnight delivery receipts
18. Letter to Tenant to remit future rental payments to GEBP dated 9.1.09, overnight delivery receipts
19. Any documents filed in this case
20. Any exhibit designated by any other party
21. Any exhibit necessary for impeachment and/or rebuttal

Dated this 8th day of October, 2009.

Respectfully Submitted,

MORGAN & LUTTRELL, L.L.P.

711 Navarro, Suite 210

San Antonio, Texas 78205

Tel. 210-224-5399

Fax 210-224-5091

morgan@morgan-luttrell.com

By: *F. Beth Morgan*

F. Beth Morgan

Texas State Bar No. 14438300

Leslie M. Luttrell

Texas State Bar No. 12708650

Attorneys for GE Commercial Finance Business
Property Corporation f/k/a General Electric Capital
Business Asset Funding Corporation (GEBP)

CERTIFICATE OF SERVICE

I, F. Beth Morgan, do hereby certify that on the 8th day of October, 2009, I transmitted a copy of the foregoing instrument, electronically and/or by depositing same in the United States First Class Mail, postage prepaid to the following:

Debtors

1300 Campbell, L.P.
1300 East Campbell Road
Fort Worth, Texas 75081

Debtor's Counsel

Joseph F. Postnikoff
Goodrich Postkikoff & Albertson, LLP
777 Main Street, Suite 1360
Fort Worth, Texas 76102

US Trustee's Office

UST U.S. Trustee
1100 Commerce Street
Room 976
Dallas, Texas 75242-1496

Notices of Appearance

Elizabeth Banda
Pedrue, Brandon, Fielder, Collins & Mott, L.L.P.
P.O. Box 13430
Arlington, Texas 76094-0430

Laurie Spindler Huffman
Linebarger Goggan Blair & Sampson
2323 Bryan Street, Suite 1600
Dallas, Texas 75201

F. Beth Morgan

F. Beth Morgan